



1 RSPN
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7 **UNITED STATES DISTRICT COURT**

8 **CLARK COUNTY, NEVADA**

9 MANUEL SANCHEZ,
10 Plaintiff,

11 vs.
12 WAL-MART STORES, INC.; DOES 1-20 and
12 ROE BUSINESS ENTITIES 1-20, inclusive,

13 Defendants.

Case No.: 2:18-cv-00282-APG-CWH

STIPULATION AND [PROPOSED]
ORDER TO EXTEND DISCOVERY
DEADLINES

[SECOND REQUEST]

14 Plaintiff MANUEL SANCHEZ (“Plaintiff”) and Defendant WAL-MART STORES, INC.
15 (“Walmart”), by and through their respective counsel of record, do hereby stipulate to extend the
16 discovery deadlines in the present case for a period of 60 days Pursuant to Local Rule IA 6-1 and
17 Local Rule 26-4.
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19 Pursuant to Local Rule IA 6-1(a), the parties hereby aver that this is the second such
20 discovery extension requested in this matter.

21 **DISCOVERY COMPLETED TO DATE**

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- 23 • The parties have conducted an FRCP 26(f) conference and have served their
23 respective FRCP 26(a) disclosures;
- 24 • Walmart has served written discovery to Plaintiff;
- 25 • Plaintiff has Answered Discovery Propounded by Defendant Walmart

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**DISCOVERY TO BE COMPLETED AND
REASONS FOR EXTENSION OF DISCOVERY**

Discovery to be completed includes:

- Written Discovery to Defendant Walmart
- Disclosure of expert witnesses;
- Walmart will depose Plaintiff;
- Plaintiff will depose Person Most Knowledge 30(b)(6) for Defendant Walmart
- Depositions of fact witnesses;
- Depositions of expert witnesses and treating medical providers;
- Rule 35 examination of Plaintiff.

The parties aver, pursuant to Local Rule 26-4, that good cause exists for the requested extension. Plaintiff's new counsel Ladah Law Firm substituted in this matter on June 6th, 2018 and the Order granting substitution was filed on June 8th, 2018. Plaintiff's counsel had to also follow with Plaintiff to respond to written discovery from Defendant which answers were served and hand delivered to counsel for Walmart on June 25th, 2018. Parties have now agreed to extend discovery deadlines to conduct the remaining discovery listed above.

6 As a result of the foregoing, an extension of 60 days is necessary to give Walmart an
7 opportunity to conduct necessary discovery into Plaintiff's medical history in time to make decisions
8 regarding expert witness retention and to retain expert witnesses prior to the expert disclosure
9 deadline. Plaintiff also needs to do additional discovery and depositions to determine what type of
0 experts will need to be retained.

The parties have acted in good faith to request this extension and have no intent, nor reason, to delay the resolution of this matter.

[PROPOSED] NEW DISCOVERY DEADLINES

Discovery Cut-Off Date

Currently: October 12, 2018

Proposed: December 12, 2018

Joint Interim Status Report

1 | Currently: August 13, 2018

2 | Proposed: October 12, 2018

3 | Expert Disclosure Deadline

Currently: August 13, 2018

Proposed: October 13, 2018

Rebuttal Expert Disclosure Deadline

8 | Currently: September 12, 2018

9 | Proposed: November 12, 2018

10 Dispositive Motion Deadline

11 | Currently: November 12, 2018

Proposed: January 12, 2019

Joint Proposed Pre-Trial Order

Currently: October 12, 2018, or 30 days after resolution of dispositive motions per

16 Local Rule 26-1(e)(5)

17 Proposed: February 12, 2019, or 30 days after resolution of dispositive

18 motions per Local Rule 26-1(e)(5)

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1 If this extension is granted, all depositions mentioned above, a Rule 35 examination of
2 Plaintiff, and expert disclosures should be concluded within the stipulated extended deadline. The
3 parties aver that this request for extension of discovery deadlines is made by the parties in good faith
4 and not for the purpose of delay.
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7 DATED this 25 day of July, 2018

8 DATED this 25 day of July, 2018.

9 /s/ Ramzy P. Lada

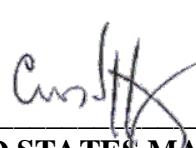
10 /s/ Ryan Kerbow

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29 Attorneys for Defendant
30 Wal-Mart Stores, Inc.

31 **IT IS SO ORDERED:**

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33 **UNITED STATES MAGISTRATE JUDGE**

34 **DATED:** July 26, 2018